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May 25, 2016

Via Electronic Case Filing  
Hon. Sandra J. Feuerstein  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

Re: Emir Carolina Garcia v. Paris Maintenance, et al., Dkt. 15-cv-663(SJF)(ARL)

Dear Judge Feuerstein:

We represent the Plaintiff in the above-referenced action. We write, with the consent of Defendant's counsel, to request a small extension of the briefing schedule set for Defendant's anticipated motion to dismiss.

On May 19, 2016, the parties attended a telephone conference before Your Honor. During this telephone conference, Plaintiff's counsel noted that we were having difficulty getting in contact with the Plaintiff and that we were giving her until May 24, 2016 to respond to our attempts to reach out to her. The briefing schedule on Defendant's anticipated motion to dismiss was set with this deadline in mind, namely, that by May 25, 2016 the parties would have a better idea of whether Plaintiff would be participating in the lawsuit and whether a motion to dismiss would be necessary.<sup>1</sup>

However, Plaintiff's counsel recently realized that we had informed Plaintiff that she had until May 27, 2016 to respond to our inquiries. In light of this inadvertent error, the parties request a short extension to the briefing schedule, with the proposed revised dates as follows (the originally-scheduled dates are struck-thru for the sake of clarity):

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<sup>1</sup> The briefing schedule mistakenly refers to "Plaintiff's motion to dismiss." See Dkt. No. 58. The parties have since filed a letter with the Court to clarify the fact that Defendants are the ones that would be filing the motion to dismiss. See Dkt. No. 59.



- Defendants' to serve Motion to Dismiss by: ~~6/13/2016~~  
6/17/2016
- Plaintiff's to serve Opposition by: ~~6/20/2016~~  
6/24/2016
- Defendants' Reply/Final Submission by: ~~6/27/2016~~  
7/3/2016

This is the parties' first request for an extension of this briefing schedule. No other deadlines would be affected by this request.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

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Todd Dickerson, Esq.